

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION**

In re:

JAMES F. MCAULIFFE,

Debtor.

CHAPTER 7

CASE NO. 16-11089-MSH

JOHN O. DESMOND, CHAPTER 7  
TRUSTEE FOR THE ESTATE OF  
JAMES F. MCAULIFFE

Plaintiff,

v.

ROBIN S. GILBERT,

Defendant.

ADVERSARY PROCEEDING  
NO. 16-01164-MSH

**SECOND JOINT MOTION TO AMEND THE DISCOVERY PLAN**

The plaintiff John O. Desmond, the duly appointed Chapter 7 Trustee (the “Trustee”) for the bankruptcy estate of James F. McAuliffe. (the “Debtor”) and the Defendant, Robin S. Gilbert (the “Defendant”) (collectively the “Parties”) hereby move to amend the Parties’ Court-approved Discovery Plan in this case for the purpose of extending all deadlines currently set forth by an additional 30 days.

In support of this Motion, the Parties state as follows:

1. On March 28, 2016, the Debtor filed a voluntary petition pursuant to Chapter 7 of the Bankruptcy Code.
2. On March 29, 2016, the Trustee was appointed as the Chapter 7 trustee of the Debtor’s bankruptcy estate.